

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

STEVEN HANSON and RANDALL  
PELLETIER, on behalf of themselves and all  
others similarly situated,  
PLAINTIFFS

v.

SCOTT R. JENSEN, in his official capacity  
as Director of the Rhode Island Department of  
Labor and Training  
DEFENDANT

Case Number: 20-cv-00232

**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

**PLEASE TAKE NOTICE** that upon the declarations of Plaintiffs Hanson and Pelletier, submitted herewith, and upon the complaint and all papers and proceedings had herein; and upon Plaintiffs' Memorandum of Law in Support of their Motion for Class Certification, Plaintiffs move this Court, at a time and place to be determined by the United States District Court to which this case is assigned, for an order granting Plaintiffs' motion pursuant to Fed. R. Civ. P. 23(b)(2) and certifying the following class:

Individuals who are or at any time on or after March 1, 2020 have been eligible for Rhode Island Unemployment Insurance Benefits (UIB) and have been determined eligible for UIB by the Rhode Island Department of Labor and Training, and who, subsequent to receiving approval for the UIB and receiving at least one payment of UIB, stopped receiving UIB when due without any written advance notice, or any written notice concurrent with the stoppage of UIB or any individualized notice of any kind, and those who in the future will have their UIB stopped without any written advance notice, or any written notice concurrent with the stoppage of UIB or any individualized notice of any kind.

Plaintiffs further request that they be designated as class representative and that their undersigned counsel be designated as class counsel for the proposed class.

Plaintiffs respectfully request a hearing on this motion and anticipate that the hearing would

last three hours.

Respectfully submitted,

/s/ Ellen Saideman

Ellen Saideman, Esq. (Bar No. 6532)  
Law Office of Ellen Saideman  
7 Henry Drive  
Barrington, RI 02806  
Telephone: 401.258.7276  
Facsimile: 401.709.0213  
Email: esaideman@yahoo.com

/s/ Lynette Labinger

Lynette Labinger, Esq., (Bar No. 1645)  
128 Dorrance Street, Box 710  
Providence, RI 02903  
Telephone: 401.465.9565  
LL@labingerlaw.com

Cooperating counsel  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF RHODE ISLAND

#### CERTIFICATE OF SERVICE

I hereby certify that I filed the within document via the ECF system on this 27th day of May, 2020 and that it is available for viewing and downloading to all counsel of record and that I provided the within document by email to:

Brenda Baum  
bbaum@riag.ri.gov

Miriam Weizenbaum  
MWeizenbaum@riag.ri.gov

/s/ Ellen Saideman

Ellen Saideman, Esq.